



March 14, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

RE: GN Docket No. 12-268; RM-11685; WT Docket No. 11-49; GN Docket No. 12-354

Dear Ms. Dortch:

On March 12, 2013, Dr. David Tennenhouse, Paula Boyd, and Staci Pies of Microsoft, along with Paul Margie of Wiltshire & Grannis LLP, met with Ruth Milkman, Tom Peters, John Leibovitz, and Paul Powell of the Wireless Telecommunications Bureau; and Julie Knapp, Mark Settle, Geraldine Matise, and Jamison Prime of the Office of Engineering and Technology. We discussed a range of spectrum issues.

Microsoft discussed its position on the incentive auction proceeding, the Globalstar petition, and the Progeny petition. Dr. Tennenhouse discussed the importance of unlicensed use of the TV band both to support Super Wi-Fi and to provide innovators the ability to leverage spectrum-sharing technologies to provide innovative new applications and offerings to consumers. Consistent with the comments the company filed in the incentive auction proceeding, Microsoft noted its support of unlicensed designations in the duplex gap, the guard band, the two channels reserved for wireless microphone use, remaining TV white spaces and any “remainder” spectrum. Microsoft also noted that the Act’s “technically reasonable” standard affords the Commission sufficient discretion to establish a large duplex gap and a guard band of more than 6 MHz. This standard allows the FCC to adopt policies that it rationally finds appropriate to prevent interference. Microsoft also raised concerns about interference that may occur into unlicensed use in the 2.4 GHz band and the 900 MHz band if the Globalstar petition and the Progeny petition were adopted.

Dr. David Tennenhouse, Paula Boyd, and Staci Pies of Microsoft also discussed the 3.5 MHz proceeding with Tom Peters, John Leibovitz, and Paul Powell of the Wireless Telecommunications Bureau; and Geraldine Matise and Jamison Prime of the Office of Engineering and Technology. Consistent with its comments in this proceeding, Microsoft supports the Commission’s proposals to improve sharing in the band and establish a General Authorized Access tier while protecting incumbent users. Dr. Tennenhouse noted the importance of this approach, which has the potential to avoid locking in technology and to enable the introduction of new and improved technologies and applications over time.



On March 12, 2013, Dr. David Tennenhouse, Paula Boyd, and Staci Pies of Microsoft also met with Renee Gregory, Legal Advisor to Chairman Julius Genachowski, and discussed the issues outlined above.

Respectfully Submitted,

/s/

Paula Boyd
Director, Government and Regulatory Affairs
Microsoft Corporation

Cc: Rene Gregory
Julie Knapp
John Leibovitz
Geraldine Matise
Ruth Milkman
Tom Peters
Paul Powell
Jamison Prime
Mark Settle